

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

UNITED STATES OF AMERICA,

V.

JOHN DI BLASI,

Defendant.

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Case No. 4:19-CR-3

# SENTENCING MEMORANDUM

Defendant John DiBlasi comes before the court for sentencing after having pled guilty to one count of Conspiracy to Unlawfully Dispense Controlled Substances under 21 U.S.C. § 846. *Dkt. No. 16*. Dr. DiBlasi acknowledges that he has been treated fairly and is truly remorseful for his conduct. *Exhibit A*. Since his youth, Dr. DiBlasi has consistently demonstrated good moral character. *Exhibit B*. His life has been characterized by service to others. *Exhibits C, D*. This sentencing memorandum is submitted by counsel to aid the court in determining an appropriate sentence under 18 U.S.C. § 3553(a).

A sentencing court must “impose a sentence sufficient, but not greater than necessary, to comply” with the purposes of sentencing set forth in 18 U.S.C. § 3553(a)(2). *United States v. Shortt*, 485 F.3d 243, 248 (4th Cir. 2007). In undertaking its analysis, the court must give consideration to the advisory

sentencing range recommended by the Guidelines and any relevant Guideline policy statements, as well as other traditional sentencing factors, such as: (1) the nature of the offense and history and characteristics of the defendant; (2) the purpose of sentencing; (3) the kinds of sentences available; (4) the Sentencing Guidelines; (5) pertinent policy statements issued by the Sentencing Commission; (6) the need to avoid unwarranted disparities among similar offenders; and (7) the need to provide restitution to victims. 18 U.S.C. § 3553(a).

Dr. DiBlasi respectfully makes the following requests: that this court strongly recommend to the Bureau of Prisons to give time credit since December 24, 2018; that any term of confinement take place at the facility in Talladega, Alabama due to its proximity to his home; and that he be placed in RDAP upon the commencement of said term of confinement.

Respectfully submitted,

s/ Paul Mooney, Esq.

Law Office of Paul Mooney, LLC  
Attorney for Defendant  
Georgia Bar No. 489132

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# CERTIFICATE OF SERVICE

This is to certify that I have on this day served all the parties in this case in accordance with the directives from the Notice of Electronic Filing which was generated as a result of electronic filing.

This 30th day of May, 2019.

Respectfully submitted,

s/ Paul Mooney, Esq.

Law Office of Paul Mooney, LLC  
Attorney for Defendant  
Georgia Bar No. 489132

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